



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

March 31, 2021

**BY CM/ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

Application GRANTED. Time is hereby excluded in the interests of justice from today, until June 3, 2021, for the reasons set forth in the Government's letter. SO ORDERED.

**Re: *United States v. Alexander Arguedas et al.*, S5 20 Cr. 135 (JMF)**

March 31, 2021

Dear Judge Furman:

The grand jury returned an S5 20 Cr. 135 (JMF) Superseding Indictment (the "S5 Superseding Indictment") yesterday. The S5 Superseding Indictment added new charges against Defendant Davonte Brown for being a felon in possession of a firearm and ammunition, in violation of Title 18, United States Code, Section 922(g) (Count Fourteen); and using and carrying a firearm in furtherance of drug trafficking, in violation of Title 18, United States Code, Sections 924(c) and 2 (Count Ten). The S5 Superseding Indictment also no longer includes Defendants Mark Brock and Jacobb Padin, who have pleaded guilty. The Government respectfully requests that the Court hold an arraignment for the S5 Superseding Indictment on the date of the next pretrial conference on June 3, 2021.

Finally, the Government also respectfully requests that the Court exclude time under the Speedy Trial Act between today and the date of the next pretrial conference, pursuant to Title 18, United States Code, Section 3161(h)(7)(A). During this time, the Government expects that the defendants will review discovery materials and prepare pretrial motions, and the parties will negotiate regarding pretrial resolutions in this case. For these reasons, the Government submits that the ends of justice served by the granting of this continuance outweigh the best interests of the public and the defendant in a speedy trial. The Government contacted defense counsel regarding exclusion of time on March 31, 2021, and no defendants indicated that they objected.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

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Cc: Counsel for all Defendants (by CM/ECF)